

1 ALLEN HYMAN, ESQ. (CBN: 73371)
2 LAW OFFICES OF ALLEN HYMAN
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5 Attorneys for Plaintiff,
MORADA MUSIC, LLC

I, Allen Hyman, declare as follows:

20 1. I have personal knowledge of the facts set forth in
21 this declaration, and I could and would testify as to these facts
22 if called upon to do so.

2. I am the attorney for plaintiff Morada Music LLC.

24 3. Defendant Jamie Tate to my knowledge has not
25 retained counsel in this matter.

26 4. For the past four weeks, I have been in contact with
27 Ms. Kate Tate, the wife of defendant Jamie Tate.

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1 5. Ms. Kate Tate and I have been in active negotiations
2 with regard to settlement of this matter.

3 6. Ms. Kate Tate has informed me that she was trained
4 as an attorney in England, and is employed by the Office of the
5 Federal Public Defender in Nashville.

6 7. I have exchanged settlement proposals with Kate
7 Tate, the latest received from Kate Tate today, October 24, 2011.

8 8. Ms. Kate Tate has indicated to me, and I to her,
9 that the parties wish, if possible, to bring this matter to a
10 resolution, and avoid further fees and costs.

11 9. I represent to the Court that the parties are making
12 progress toward resolution of this matter, and that it would be of
13 assistance if the Court would allow defendant Jamie Tate an
14 additional period of time to respond to the Complaint, so that the
15 parties could fully explore settlement communications.

16 I declare under penalty of perjury under the laws of the
17 United States that the foregoing is true and correct, and that this
18 declaration was executed on October 24, 2011, at North Hollywood,
19 California.

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/s/ Allen Hyman
Allen Hyman

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State to the within action. My business address is 10737 Riverside Drive, North Hollywood, California 91602. I am over the age of 18 and not a party

On October 24, 2011, I served the foregoing document described as
DECLARATION OF ALLEN HYMAN IN RESPONSE TO THE ORDER TO SHOW CAUSE
the parties in this action by placing a copy thereof enclosed in a
sealed envelope addressed as follows:

Jamie Tate
2741 Larmon Dr.
Nashville, TN 37204

[X] (BY MAIL) to the addressees as indicated on the attached Service List, as follows: I am "readily familiar" with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at North Hollywood, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

[] (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the addressee as indicated on the attached service list.

[] (BY FAXSIMILE) I sent such document via facsimile to the offices of the addressees as indicated on the attached service list.

[] (BY OVERNIGHT MAIL SERVICE) I caused such document to be delivered via Overnight Mail to the addressees as indicated on the attached service list.

[X] (**FEDERAL**) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on October 24, 2011, at North Hollywood, California.

/s/ Allen Hyman
Allen Hyman